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October 3, 2006

**VIA CMF AND HAND DELIVERY**

The Honorable Joseph J. Farnan, Jr.  
United States District Court  
for the District of Delaware  
844 King Street  
Wilmington, DE 19801

Re: • *Magten Asset Management Corp. and Law Debenture Trust Co. v. Northwestern Corp.*; C.A. No. 04-1494-JJF; and  
• *Magten Asset Management Corp. v. Mike J. Hanson and Ernie J. Kindt*; C.A. No. 05-0499-JJF

Your Honor:

We write on behalf of Magten Asset Management Corporation and Law Debenture Trust Company of New York, the Plaintiffs in the above-captioned actions. On September 29, 2006, the Court entered its Orders denying Northwestern's Motions for Protective Orders (D.I. 86 in 04-1494; D.I. 115 in 05-499). Accordingly, Plaintiffs plan to proceed with discovery, including the discovery previously stayed by operation of Local Rule 30.2.

Because many of the dates originally proposed for the scheduling orders have been overtaken during consideration of these motions, Plaintiffs respectfully request that the Court schedule a conference in order to set or reset dates, as applicable, for finalizing a scheduling order in the above cases. We will, of course, seek to discuss suggested dates with the other parties in advance of the requested conference.

Counsel is available by telephone, should the Court have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Dale Dubé".

Dale R. Dubé  
I.D. No. 2863

- and -



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